

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION**

Crystal Long	*	
	*	
Plaintiff,	*	Case No.: 8:17-cv-01955-GJH
	*	
v.	*	
	*	
Pendrick Capital Partners II, LLC, et al.	*	
	*	
Defendants.	*	

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**JOINT STATUS REPORT**

On March 20, 2018, counsel for Plaintiff Crystal Long (“Plaintiff”), Ability Recovery Services, LLC (“Ability”), and Pendrick Capital Partners II, LLC (“Pendrick”) met by phone and, though their respective counsel, issue the following Joint Status Report:

**A. Completion of Discovery**

Discovery in this case closed on February 22, 2018. On March 16, 2018, the Court denied a motion filed by Ability to extend the discovery deadline. Discovery is, therefore, complete.

**B. Pending Motions**

There are no motions pending at this time.

**C. Dispositive Pretrial Motions**

All parties intend to file cross-motions for summary judgment and propose the following briefing schedule:

March 27, 2018	Plaintiff’s Opening Brief
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April 13, 2018	Defendants' Opening Briefs and Opposition to Plaintiff's Motion
April 30, 2018	Plaintiff's Consolidated Reply Brief and Opposition to Defendants' Motions
May 14, 2018	Defendants' Reply Briefs

As Defendants intend to file separate Motions for Summary Judgment, Plaintiff will file a consolidated Opposition and respectfully requests that the Court increase the length limitation to 45 pages.

#### **D. Jury Trial and Length**

Plaintiff requests that this case be tried before a jury. The parties anticipate a two-day trial.

#### **E. Certification of Settlement Negotiations**

The parties hereby certify that they have engaged, through Plaintiff's counsel Ingmar Goldson, counsel for Ability Ronald Metcho, and counsel for Pendrick Morgan Marcus, in ongoing telephonic settlement negotiations since the inception of the case. Defendants issued an Offer of Judgment on February 8, 2018. The parties, through the above-referenced, counsel, have continued their ongoing telephonic negotiation. In addition, on February 19, 2018, the above-referenced counsel, as well as Courtney Weiner, on behalf of Plaintiff, met in person at the The Goldson Law Office in Silver Spring, Maryland, prior to the start of Plaintiff's deposition. Though the parties have negotiated seriously, they have not been able to reach a settlement.

#### **F. Referral for Settlement Conference**

The parties believe that a settlement conference would be beneficial to negotiations and request assistance from the Court in that respect. Plaintiff requests that the settlement conference be held following the resolution of dispositive pretrial motions, while Defendants request that it be held before such resolution.

**G. Consent to Magistrate Judge**

The parties do not consent to further proceedings before a Magistrate Judge.

**H. Other Matters**

The parties do not have any additional matters that require the Court's attention at this time.

Dated: Washington, DC  
March 20, 2018

Respectfully submitted,

/s/ Courtney L. Weiner  
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*Counsel for Ability*

**CERTIFICATE OF SERVICE**

I certify that on this 20<sup>th</sup> day of March, 2018, the foregoing Joint Status Report was served via ECF to all counsel of record.

/s/ Courtney L. Weiner